



## Notice of Service of Process

null / ALL  
Transmittal Number: 21766405  
Date Processed: 07/17/2020

---

<b>Primary Contact:</b>	State Farm Enterprise SOP Corporation Service Company- Wilmington, DELAWARE 251 Little Falls Dr Wilmington, DE 19808-1674
<b>Entity:</b>	State Farm Mutual Automobile Insurance Company Entity ID Number 3461675
<b>Entity Served:</b>	State Farm Mutual Automobile Insurance Company
<b>Title of Action:</b>	Alexandra Gilham vs. State Farm Mutual Automobile Insurance Company
<b>Matter Name/ID:</b>	Alexandra Gilham vs. State Farm Mutual Automobile Insurance Company (10377239)
<b>Document(s) Type:</b>	Summons/Complaint
<b>Nature of Action:</b>	Contract
<b>Court/Agency:</b>	Clay County Circuit Court, MO
<b>Case/Reference No:</b>	20CY-CV05519
<b>Jurisdiction Served:</b>	Missouri
<b>Date Served on CSC:</b>	07/16/2020
<b>Answer or Appearance Due:</b>	30 Days
<b>Originally Served On:</b>	MO Dept. of Commerce and Insurance on 07/15/2020
<b>How Served:</b>	Certified Mail
<b>Sender Information:</b>	Joseph R. Hillebrand 314-421-0216

---

Information contained on this transmittal form is for record keeping, notification and forwarding the attached document(s). It does not constitute a legal opinion. The recipient is responsible for interpreting the documents and taking appropriate action.

**To avoid potential delay, please do not send your response to CSC**  
251 Little Falls Drive, Wilmington, Delaware 19808-1674 (888) 690-2882 | [sop@cscglobal.com](mailto:sop@cscglobal.com)

State of Missouri

Department of Commerce and Insurance



---

**TO:** Corporate Secretary (or United States Manager or Last Appointed General Agent) of

STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY  
CSC LAWYERS INCORPORATING SERVICE COMPANY  
221 BOLIVAR STREET  
JEFFERSON CITY, MO 65101

**RE:** Court: Clay Co. Circuit Court, Case Number: 20CY-CV05519

You will take notice that original process in the suit against you, a copy of which is attached hereto and sent to you by certified mail, was duly served upon you at Jefferson City, Missouri, by serving the same on the Director of the Department of Commerce and Insurance of the state of Missouri, Dated at Jefferson City, Missouri this Wednesday, July 15, 2020.

A handwritten signature in cursive ink, appearing to read "Chlora Lindley-Dreyer".

---

Director of Commerce and Insurance

301 West High Street, Room 530, P.O. Box 690 / JeffersonCity, Missouri 65102-0690  
Telephone 573-526-0000 / TDD 1-573-526-4536 (Hearing Impaired)  
<http://www.dci.mo.gov>



**IN THE 7TH JUDICIAL CIRCUIT COURT, CLAY COUNTY, MISSOURI**

Judge or Division: JANET SUTTON	Case Number: 20CY-CV05519
Plaintiff/Petitioner: ALEXANDRA E. GILHAM	Plaintiff's/Petitioner's Attorney/Address JOSEPH ROBERT HILLEBRAND BROWN & CROUPPEN 211 N BROADWAY STE 1600 SAINT LOUIS, MO 63102
vs.  Defendant/Respondent: STATE FARM MUTUAL AUTOMOBILE INSURANCE CO	Court Address: 11 S WATER LIBERTY, MO 64068
Nature of Suit: CC Pers Injury-Vehicular	MISSOURI DEPARTMENT OF COMMERCE AND INSURANCE  (Date File Stamp)

SOP RECEIPT DATE

JUL 15 2020

**Summons in Civil Case**

The State of Missouri to: STATE FARM MUTUAL AUTOMOBILE INSURANCE CO  
Alias:

SRV: DIR. OF DIV. OF INSURANCE  
301 WEST HIGH STREET  
JEFFERSON CITY, MO 65101



CLAY COUNTY

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

7/7/2020

Date

BARB WILMOT

Clerk

Further Information:

**Sheriff's or Server's Return**

Note to serving officer: Summons should be returned to the court within thirty days after the date of issue.

I certify that I have served the above summons by: (check one)

delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.  
 leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with \_\_\_\_\_ a person of the Defendant's/Respondent's family over the age of 15 years.  
 (for service on a corporation) delivering a copy of the summons and a copy of the petition to \_\_\_\_\_ (name) \_\_\_\_\_ (title).

other \_\_\_\_\_

Served at \_\_\_\_\_ (address)

in \_\_\_\_\_ (County/City of St. Louis), MO, on \_\_\_\_\_ (date) at \_\_\_\_\_ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

(Seal)

Subscribed and sworn to before me on \_\_\_\_\_ (date).

My commission expires: \_\_\_\_\_

Date

Notary Public

**Sheriff's Fees**

Summons	\$ _____
Non Est	\$ _____
Sheriff's Deputy Salary	\$ _____
Supplemental Surcharge	\$ 10.00
Mileage	\$ _____ (_____ miles @ \$_____ per mile)
Total	\$ _____

A copy of the summons and a copy of the petition must be served on each Defendant/Respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.

**20CY-CV05519**

IN THE CIRCUIT COURT OF CLAY COUNTY  
STATE OF MISSOURI

ALEXANDRA GILHAM, )  
vs. Plaintiff, ) Cause No.  
vs. ) Division No.  
**STATE FARM MUTUAL AUTOMOBILE ) JURY TRIAL DEMANDED**  
**INSURANCE COMPANY** )  
SERVE: )  
Director of Insurance )  
State of Missouri )  
301 W. High Street, Room 530 )  
Jefferson City, MO 65101 )  
Defendants. )

**PETITION**

Comes Now, Plaintiff, Alexandra Gilham, and states as follows for her claims against Defendant State Farm Mutual Automobile Insurance Company:

**STATEMENT OF FACTS**

1. Plaintiff, Alexandra Gilham, resides in Clinton County, State of Missouri.
2. Defendant, State Farm Mutual Automobile Insurance Company, (hereinafter Defendant) is a corporation authorized to do business and actively conducting business within Clay County, State of Missouri.
3. Defendant has consented and authorized the Superintendent of Insurance to accept service of process arising out of insurance claims made in the State of Missouri.
4. Defendant has an agent or office for the transaction of its usual and customary business in the County of Clay, State of Missouri.

5. On or about June 4, 2015, Plaintiff was involved in a collision with a vehicle being driven by Laura Love. Love's failure to yield the right of way to Plaintiff caused severe injuries to Plaintiff, including but not necessarily limited to, a significant right and left shoulder injury causing pain from her mid forearm down to the hand as well as the continued intermittent numbness and tingling in her 3<sup>rd</sup> and 4<sup>th</sup> fingers in the right hand, including mild focal neuropathy involvement of the medial antebrachial cutaneous nerve in her right forearm.

6. Love was insured on the date of the wreck by Automobile Club Inter-Insurance Company which paid its limits of liability coverage in the amount of \$50,000.00 as settlement for all damages against Laura Love.

7. On the date of that wreck, Plaintiff was insured by Defendant State Farm Mutual Automobile Insurance Company under a policy that included underinsured motorist coverage.

8. Plaintiff has performed all the duties and conditions precedent required by Defendant's applicable insurance policy.

**COUNT I**  
**UNDERINSURED MOTORIST BENEFITS**

For Count I of her petition against Defendant, Plaintiff states as follows:

9. Plaintiff hereby incorporates and adopts by reference paragraphs 1-8 of this Petition, as though fully pleaded herein.

10. Defendant issued a policy of insurance (policy number 2664471B1825A) insuring Plaintiff on June 4, 2015. Plaintiff was a covered insured under this policy which provided underinsured motorist coverage in full force and effect at the time of the subject wreck.

11. At the time of the subject wreck, Laura Love was an underinsured motorist as defined by Defendant's policy of insurance.

12. As a direct result of the foregoing negligent acts and omissions, Plaintiff suffered severe injuries, including a significant right and left shoulder injury causing pain from her mid forearm down to the hand as well as the continued intermittent numbness and tingling in her 3<sup>rd</sup> and 4<sup>th</sup> fingers in the right hand, including mild focal neuropathy involvement of the medial antebrachial cutaneous nerve in her right forearm; she has suffered great pain of the mind and body and will continue to suffer great pain of mind and body permanently; she has sought and received medical care and attention, and will continue to receive medical care and attention in the future; she has lost earning capacity and will continue to lose earning capacity in the future; she has incurred medical expenses and will continue to incur medical expenses in the future; all to her damage.

13. Because Love was an underinsured motorist within the provisions of Defendant's policy, and because her carelessness and negligence caused and contributed to cause the injuries and damages set forth, Plaintiff is entitled to an award of damages to be paid by Defendant State Farm Mutual Automobile Insurance Company pursuant to its aforementioned policy.

WHEREFORE, Plaintiff, Alexandra Gilham, prays that judgment be entered against Defendant State Farm Mutual Automobile Insurance Company on Count I of this Petition in a fair and reasonable amount in excess of Twenty-Five Thousand Dollars (\$25,000.00), plus costs, prejudgment interest, and such other relief as the Court deems just and proper.

**COUNT II**  
**VEXATIOUS REFUSAL TO PAY**

For Count II of her petition against Defendant, Plaintiff states as follows:

14. Plaintiff, Alexandra Gilham, hereby incorporates and adopts by reference paragraphs 1-13 of this Petition as though fully pleaded herein.

15. That Defendant's failure and refusal to pay Plaintiff the reasonable amount due under said policy of insurance has been without reasonable cause; Defendant has refused for a period exceeding thirty days to make payment in accordance with the terms of its policy; therefore, Plaintiff is entitled to damages for vexatious refusal to pay pursuant to R.S.Mo. Chapter 375.

WHEREFORE, Plaintiff, Alexandra Gilham, prays for judgment in her favor and against Defendant State Farm Mutual Automobile Insurance Company for damages pursuant to R.S.Mo. Chapter 375 in an amount that is fair and reasonable and within the jurisdictional limits of this Court, together with a reasonable attorney's fee, their costs of this action, and such further relief this Court deems just and proper.

BROWN & CROUPPEN, P.C.

BY: /s/ Joseph R. Hillebrand  
Joseph R. Hillebrand #43344  
Michael Kopit #65686  
Brown & Crouppen, P.C.  
211 N. Broadway, Suite 1600  
St. Louis, MO 63102  
(314) 421-0216 phone  
(314) 421-0359 fax  
[pipelineadings@getbc.com](mailto:pipelineadings@getbc.com)  
[JoeH@getbc.com](mailto:JoeH@getbc.com)  
[MichaelK@getbc.com](mailto:MichaelK@getbc.com)  
**ATTORNEY FOR PLAINTIFF**

**IN THE CIRCUIT COURT OF CLAY COUNTY  
STATE OF MISSOURI**

ALEXANDRA GILHAM, )  
vs. Plaintiff, )  
vs. ) Cause No.  
STATE FARM MUTUAL AUTOMOBILE )  
INSURANCE COMPANY ) Division No.  
SERVE: )  
Director of Insurance )  
State of Missouri )  
301 W. High Street, Room 530 )  
Jefferson City, MO 65101 )  
Defendants. )

**ENTRY OF APPEARANCE AND DESIGNATION OF LEAD COUNSEL**

Comes now, Plaintiff, Alexandra Gilham, by and through the undersigned counsel and hereby designates Joseph R. Hillebrand as her lead attorney in this action.

BROWN & CROUPPEN, P.C.

BY: /s/ Joseph R. Hillebrand  
Joseph R. Hillebrand #43344  
Michael Kopit #65686  
Attorney for Plaintiff  
211 N. Broadway, Ste. 1600  
St. Louis, MO 63102  
(314) 421-0216  
(314) 421-0359 (Fax)  
[joeh@getb.com](mailto:joeh@getb.com)  
[michaelk@getbc.com](mailto:michaelk@getbc.com)  
[pipelineadings@GetBC.com](mailto:pipelineadings@GetBC.com)

**20CY-CV05519**

IN THE CIRCUIT COURT OF CLAY COUNTY  
STATE OF MISSOURI

ALEXANDRA GILHAM, )  
vs. Plaintiff, )  
vs. ) Cause No.  
STATE FARM MUTUAL AUTOMOBILE )  
INSURANCE COMPANY ) JURY TRIAL DEMANDED  
SERVE: )  
Director of Insurance )  
State of Missouri )  
301 W. High Street, Room 530 )  
Jefferson City, MO 65101 )  
Defendants. )

**PETITION**

Comes Now, Plaintiff, Alexandra Gilham, and states as follows for her claims against Defendant State Farm Mutual Automobile Insurance Company:

**STATEMENT OF FACTS**

1. Plaintiff, Alexandra Gilham, resides in Clinton County, State of Missouri.
2. Defendant, State Farm Mutual Automobile Insurance Company, (hereinafter Defendant) is a corporation authorized to do business and actively conducting business within Clay County, State of Missouri.
3. Defendant has consented and authorized the Superintendent of Insurance to accept service of process arising out of insurance claims made in the State of Missouri.
4. Defendant has an agent or office for the transaction of its usual and customary business in the County of Clay, State of Missouri.

5. On or about June 4, 2015, Plaintiff was involved in a collision with a vehicle being driven by Laura Love. Love's failure to yield the right of way to Plaintiff caused severe injuries to Plaintiff, including but not necessarily limited to, a significant right and left shoulder injury causing pain from her mid forearm down to the hand as well as the continued intermittent numbness and tingling in her 3<sup>rd</sup> and 4<sup>th</sup> fingers in the right hand, including mild focal neuropathy involvement of the medial antebrachial cutaneous nerve in her right forearm.

6. Love was insured on the date of the wreck by Automobile Club Inter-Insurance Company which paid its limits of liability coverage in the amount of \$50,000.00 as settlement for all damages against Laura Love.

7. On the date of that wreck, Plaintiff was insured by Defendant State Farm Mutual Automobile Insurance Company under a policy that included underinsured motorist coverage.

8. Plaintiff has performed all the duties and conditions precedent required by Defendant's applicable insurance policy.

**COUNT I**  
**UNDERINSURED MOTORIST BENEFITS**

For Count I of her petition against Defendant, Plaintiff states as follows:

9. Plaintiff hereby incorporates and adopts by reference paragraphs 1-8 of this Petition, as though fully pleaded herein.

10. Defendant issued a policy of insurance (policy number 2664471B1825A) insuring Plaintiff on June 4, 2015. Plaintiff was a covered insured under this policy which provided underinsured motorist coverage in full force and effect at the time of the subject wreck.

11. At the time of the subject wreck, Laura Love was an underinsured motorist as defined by Defendant's policy of insurance.

12. As a direct result of the foregoing negligent acts and omissions, Plaintiff suffered severe injuries, including a significant right and left shoulder injury causing pain from her mid forearm down to the hand as well as the continued intermittent numbness and tingling in her 3<sup>rd</sup> and 4<sup>th</sup> fingers in the right hand, including mild focal neuropathy involvement of the medial antebrachial cutaneous nerve in her right forearm; she has suffered great pain of the mind and body and will continue to suffer great pain of mind and body permanently; she has sought and received medical care and attention, and will continue to receive medical care and attention in the future; she has lost earning capacity and will continue to lose earning capacity in the future; she has incurred medical expenses and will continue to incur medical expenses in the future; all to her damage.

13. Because Love was an underinsured motorist within the provisions of Defendant's policy, and because her carelessness and negligence caused and contributed to cause the injuries and damages set forth, Plaintiff is entitled to an award of damages to be paid by Defendant State Farm Mutual Automobile Insurance Company pursuant to its aforementioned policy.

WHEREFORE, Plaintiff, Alexandra Gilham, prays that judgment be entered against Defendant State Farm Mutual Automobile Insurance Company on Count I of this Petition in a fair and reasonable amount in excess of Twenty-Five Thousand Dollars (\$25,000.00), plus costs, prejudgment interest, and such other relief as the Court deems just and proper.

**COUNT II**  
**VEXATIOUS REFUSAL TO PAY**

For Count II of her petition against Defendant, Plaintiff states as follows:

14. Plaintiff, Alexandra Gilham, hereby incorporates and adopts by reference paragraphs 1-13 of this Petition as though fully pleaded herein.

15. That Defendant's failure and refusal to pay Plaintiff the reasonable amount due under said policy of insurance has been without reasonable cause; Defendant has refused for a period exceeding thirty days to make payment in accordance with the terms of its policy; therefore, Plaintiff is entitled to damages for vexatious refusal to pay pursuant to R.S.Mo. Chapter 375.

WHEREFORE, Plaintiff, Alexandra Gilham, prays for judgment in her favor and against Defendant State Farm Mutual Automobile Insurance Company for damages pursuant to R.S.Mo. Chapter 375 in an amount that is fair and reasonable and within the jurisdictional limits of this Court, together with a reasonable attorney's fee, their costs of this action, and such further relief this Court deems just and proper.

BROWN & CROUPPEN, P.C.

BY: /s/ Joseph R. Hillebrand  
Joseph R. Hillebrand #43344  
Michael Kopit #65686  
Brown & Crouppen, P.C.  
211 N. Broadway, Suite 1600  
St. Louis, MO 63102  
(314) 421-0216 phone  
(314) 421-0359 fax  
pipeline@getbc.com  
JoeH@getbc.com  
MichaelK@getbc.com  
**ATTORNEY FOR PLAINTIFF**

**20CY-CV05519**

**IN THE CIRCUIT COURT OF CLAY COUNTY  
STATE OF MISSOURI**

ALEXANDRA GILHAM, )  
vs. Plaintiff, ) Cause No.  
vs. ) Division No.  
**STATE FARM MUTUAL AUTOMOBILE ) JURY TRIAL DEMANDED**  
**INSURANCE COMPANY** )  
SERVE: )  
Director of Insurance )  
State of Missouri )  
301 W. High Street, Room 530 )  
Jefferson City, MO 65101 )  
Defendants. )

**ENTRY OF APPEARANCE AND DESIGNATION OF LEAD COUNSEL**

Comes now, Plaintiff, Alexandra Gilham, by and through the undersigned counsel and hereby designates Joseph R. Hillebrand as her lead attorney in this action.

BROWN & CROUPPEN, P.C.

BY: /s/ Joseph R. Hillebrand  
Joseph R. Hillebrand #43344  
Michael Kopit #65686  
Attorney for Plaintiff  
211 N. Broadway, Ste. 1600  
St. Louis, MO 63102  
(314) 421-0216  
(314) 421-0359 (Fax)  
[joeh@getb.com](mailto:joeh@getb.com)  
[michaelk@getbc.com](mailto:michaelk@getbc.com)  
[pipelineadings@GetBC.com](mailto:pipelineadings@GetBC.com)